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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

DPH Holdings Corp., *et al.*,  
Reorganized Debtors.

Chapter 11

Case No. 05-44481 (RDD)  
(Jointly Administered)

**Declaration of Thomas D. Noonan in Support of Reorganized  
Debtors' Response to the Motion of Wells Fargo Bank, N.A.,  
Successor to Wachovia Bank, National Association, Under Rule  
60(B) of the Federal Rules of Civil Procedure and Rule 9024 of the  
Federal Rules of Bankruptcy Procedure for Relief from the Orders  
Sealing Complaint and Extending the Time for Service Thereof**

THOMAS D. NOONAN, under penalty of perjury, pursuant to 28 U.S.C. § 1746,  
deposes and says:

1. I am a shareholder with Butzel Long, a professional corporation, attorneys  
for Plaintiffs, and I am familiar with the facts set forth herein. I submit this declaration in  
support of the Reorganized Debtors' Response to the Motion of  
Wells Fargo Bank, N.A., Successor to Wachovia Bank, National Association, Under Rule  
60(B) of the Federal Rules of Civil Procedure and Rule 9024 of the Federal Rules of

Bankruptcy Procedure for Relief from the Orders Sealing Complaint and Extending the Time for Service Thereof (“Response”).

2. Attached to the Response as Exhibit A is a copy of the Complaint that Delphi Automotive Systems, LLC filed against Laneko Engineering, Inc. in the United States District Court Eastern District of Michigan on August 17, 2005, where it was given case number 2:05CV73193.

3. Attached to the Response as Exhibit B is a copy of the Wachovia Adversary Complaint.

4. Attached to the Response as Exhibit C is a copy of the relevant portions of the transcript from the April 1, 2010 Hearing.

5. Attached to the Response as Exhibit D is a copy of the relevant portions of the transcript from the August 16, 2007 Hearing.

6. Attached to the Response as Exhibit E is a copy of the relevant portions of the transcript from the March 19, 2008 Hearing.

7. Attached to the Response as Exhibit F is a copy of the relevant portions of the transcript from the April 30, 2008 Hearing.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Detroit, Michigan  
October 18, 2011

/s/ Thomas D. Noonan  
Thomas D. Noonan